

**THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

_____	)	
JOHN DOES 162, et al.,	)	
	)	Case No. 2:23-cv-02991
Plaintiffs,	)	
	)	Judge Michael H. Watson
v.	)	
	)	Chief Magistrate Judge Elizabeth P.
THE OHIO STATE UNIVERSITY,	)	Deavers
	)	
Defendant.	)	
_____	)	
STEVE SNYDER-HILL, et al.,	)	Case No. 2:23-cv-02993
	)	
Plaintiffs,	)	Judge Michael H. Watson
	)	
v.	)	Chief Magistrate Judge Elizabeth P.
	)	Deavers
THE OHIO STATE UNIVERSITY,	)	
	)	
Defendant.	)	
_____	)	
WILLIAM KNIGHT, et al.,	)	Case No. 2:23-cv-02994
	)	
Plaintiffs,	)	Judge Michael H. Watson
	)	
v.	)	Chief Magistrate Judge Elizabeth P.
	)	Deavers
THE OHIO STATE UNIVERSITY,	)	
	)	
Defendant.	)	
_____	)	
JOHN DOE,	)	Case No. 2:23-cv-02996
	)	
Plaintiffs,	)	Judge Michael H. Watson
	)	
v.	)	Chief Magistrate Judge Elizabeth P.
	)	Deavers
THE OHIO STATE UNIVERSITY,	)	
	)	

Defendant.	)	
_____	)	
EDWARD GONZALES, et al.,	)	
	)	Case No. 2:23-cv-3051
Plaintiffs,	)	
	)	Judge Michael H. Watson
v.	)	
	)	Chief Magistrate Judge Elizabeth P.
THE OHIO STATE UNIVERSITY,	)	Deavers
	)	
Defendant.	)	
_____	)	

**DEFENDANT THE OHIO STATE UNIVERSITY’S RESPONSE TO PLAINTIFFS’  
MOTION FOR EXTENSION OF TIME TO SUBMIT FACT SHEETS**

In response to Plaintiffs’ Motion for Extension of Time to Submit Fact Sheets (the “Motion”) (ECF No. 39), Defendant The Ohio State University (“Ohio State”) states as follows:

1) Plaintiffs state in their Motion that the extra time necessary to prepare their fact sheets is due to numerous of them being retraumatized. Plaintiffs requested the bellwether process which the Court has implemented. The bellwether process necessarily requires the use of fact sheets providing information about plaintiffs’ claims, which Plaintiffs and their counsel knew when they requested the process.

2) Ohio State notes that rather than focus on completing the fact sheets, someone on behalf of Plaintiffs is directing their recent efforts toward putting fliers on the windows of vehicles in parking garages in Columbus. An example of such a flier placed on a vehicle this past week is attached hereto as Exhibit A. To the extent the Court is inclined to grant the extension requested by Plaintiffs, Ohio State requests that plaintiffs and their counsel be directed to apply their efforts to the fact sheets, and not unproductive, extra-judicial flier activities.

3) On April 5, 2024, the parties submitted a [Proposed] Joint Scheduling Order. To the extent the Court is inclined to grant the requested extension, all dates, agreed or not, will need

to be extended by 31 days. This is because all dates in the [Proposed] Joint Scheduling Order were based on the fact sheets being exchanged on May 31, 2024. This also includes that, as Plaintiffs acknowledge, Ohio State not be required to provide its fact sheet until July 1, 2024.

4) The caption to Plaintiffs' Motion does not contain reference to the *John Doe 162, et al.* case, Case No. 2:23-cv-02991, and the Motion is not signed by Plaintiffs' counsel in that case. To the extent the Court is inclined to grant the extension requested by Plaintiffs, Ohio State requests that the extension, as well as any dates that are extended in a scheduling order because of Plaintiffs' request, should apply to all five cases, including the *John Doe 162, et al.* case.

5) If the Court denies Plaintiffs' Motion, Ohio State is prepared to provide its Fact Sheets on May 31, 2024.

DAVE YOST  
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*Special Counsel for Defendant The Ohio State University*

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was filed electronically on May 23, 2024. Notice was also sent by operation of the Court's electronic filing system to all other counsel who have entered an appearance and any parties who have entered an appearance through counsel. The parties may access this filing through the Court's ECF system.

/s/ Michael H. Carpenter

Michael H. Carpenter

*Trial Attorney for Defendant The Ohio State University*

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